

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

H.B.,	)	CIVIL ACTION FILE
	)	
Plaintiff,	)	NO. 1:22-cv-01181-JPB
	)	
v.	)	
	)	
RED ROOF INNS, INC., <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	

**RRI DEFENDANTS' MOTION TO EXCLUDE EVIDENCE RELATING TO  
DEFENDANTS' FINANCIAL CONDITION**

Defendants Red Roof Inns, Inc., FMW RRI I, LLC, and RRI West Management, LLC (RRI Defendants) move this Court to enter an order excluding evidence relating to RRI Defendants' financial condition. This evidence is irrelevant to Plaintiff's claim for damages under the TVPRA (18 U.S.C. 1595(a)). Further, any probative value (if any) of this evidence is substantially outweighed by the danger of unfair prejudice to RRI Defendants and its potential to confuse and mislead the jury. The Court should therefore exclude this evidence.

A Memorandum in Support is filed contemporaneously and incorporated fully.

Dated: October 21, 2024

Respectfully submitted,

/s/ Marcella C. Ducca

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*Attorneys for Defendants Red Roof Inns,  
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Management, LLC*

**RULE 7.1D CERTIFICATE OF COMPLIANCE**

Pursuant to Local Rule 7.1(D) of the United States District Court of the Northern District of Georgia, the undersigned certifies that the foregoing submission to the Court was computer-processed, double-spaced between lines, and used Times New Roman font of 14-point size.

Dated: October 21, 2024

/s/ Marcella C. Ducca  
Marcella C. Ducca

*One of the Attorneys for Defendants Red  
Roof Inns, Inc., FMW RRI I, LLC, and  
RRI West Management, LLC*

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that on October 21, 2024, a copy of the above was filed with the United States District Court for the Northern District of Georgia and served on counsel of record through the Court's CM/ECF system.

Dated: October 21, 2024

/s/ Marcella C. Ducca  
Marcella C. Ducca

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